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Hearing Date: June 28, 2017  
Hearing Time: 10:00 AM (EST)  
Objection Deadline: June 7, 2017

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO  
TRUSTEE'S MOTION AND MEMORANDUM OF LAW  
TO AFFIRM HIS DETERMINATIONS DENYING CLAIMS OF CLAIMANTS  
HOLDING INTERESTS IN JEFFREY SCHAFER DONNA SCHAFER JOINT  
TENANCY AND STANLEY I. LEHRER AND STUART M. STEIN JOINT TENANCY**

Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC (the "Trustee") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.* and the chapter 7 estate of Bernard

L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On May 19, 2017, the Trustee filed the Trustee's Motion and Memorandum of Law to Affirm His Determinations Denying Claims of Claimants Holding Interests in Jeffrey Schaffer Donna Schaffer Joint Tenancy and Stanley I. Lehrer and Stuart M. Stein Joint Tenancy (the "Motion") (ECF No. 16031) and filed the Declaration of Vineet Sehgal in support of the Motion (the "Sehgal Declaration"), on May 19, 2017 (ECF No. 16033).

2. The deadline for filing objections to the Motion expired on June 7, 2017 at 4:00 p.m.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to (i) all claimants listed on Exhibit 2 annexed to the Sehgal Declaration; (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the United States Attorney for the Southern District of New York; and (vii) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel for the Trustee has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon.

5. On June 2, 2017, Elaine Stein Roberts by and through her counsel, withdrew the objection to the Trustee's determination of claim number 011562 filed by Ms. Stein on behalf of the Elaine Stein Roberts' IRA (ECF No. 16117).

6. Prior to filing the Motion, counsel for the Trustee attempted to reach Jeffrey and Donna Schaffer regarding the withdrawal of their objections to the Trustee's determination of

claim numbers 100398 and 100401 in light of this Court's Memorandum Decision issued on April 10, 2017 (ECF No. 15709). Neither responded to counsel's messages or filed an objection to the Motion.

7. An electronic copy of a proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion, and Exhibit A thereto, will be submitted to the Court along with this certificate.

8. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing, but notes that the Schaffer Objecting Claimants are *pro se*.

Dated: New York, New York  
June 22, 2017

By: /s/ David J. Sheehan  
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